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8 UNITED STATES DISTRICT COURT  
9 DISTRICT OF NEVADA

10 GEORGE A. WAGNER,

11  
12 Plaintiff,

13 vs.

14 FORD MOTOR CREDIT COMPANY LLC,  
UNIVERSAL PAYMENT CORPORATION,  
15 WESTSTAR CREDIT UNION, EQUIFAX  
INFORMATION SERVICES LLC AND  
16 EXPERIAN INFORMATION SOLUTIONS,  
INC.

17 Defendants.

Case No.: 2:18-cv-00173-APG-PAL

**STIPULATION AND ORDER TO  
EXTEND TIME TO ANSWER OR  
OTHERWISE PLEAD**

**(SECOND REQUEST)**

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19 COMES NOW, Defendant, FORD MOTOR CREDIT COMPANY LLC, (“Defendant”)  
20 by and through its attorney of record, GARY E. SCHNITZER, ESQ., of the law firm of  
21 KRAVITZ, SCHNITZER & JOHNSON, CHTD., and the Plaintiff, GEORGE A. WAGNER, by  
22 and through his attorneys of record, MICHAEL KIND, ESQ., of the law firm of KAZEROUNI  
23 LAW GROUP, APC, and hereby submit this Stipulation to Extend Time To File An Answer or  
24 Otherwise Plead.

25 WHEREAS, Plaintiff filed his Complaint on January 31, 2018;

26 WHEREAS, Defendant was served with the Complaint on February 7, 2018;

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WHEREAS, Defendant's initial deadline to file its Answer to the Complaint was approximately February 28, 2018;

WHEREAS, Defendant received an Extension up to and including March 15, 2018 to file its Response;

WHEREAS, Defendant is still in the process of obtaining proper documents in order to address specific allegations made in Plaintiff's Complaint;

WHEREAS, the parties seek up to and including March 22, 2018 for Defendant to file its Response. Plaintiff has no opposition to this extension;

WHEREAS, this is the second request by the Parties seeking such extension;

THEREFORE, in consideration of the foregoing, and for good cause, IT IS HEREBY STIPULATED AND AGREED by and between the Parties as follows:

Defendant, FORD MOTOR CREDIT COMPANY LLC shall have up to and including March 22, 2018 to file an Answer or Otherwise Plead to Plaintiff's Complaint.

**IT IS SO STIPULATED.**

DATED this 15<sup>th</sup> day of March, 2018.

/s/ Michael Kind, Esq.

Michael Kind, Esq.

Nevada Bar No. 13903

KAZEROUNI LAW GROUP, APC

6069 South Fort Apache Road, Suite 100

Las Vegas, NV 89148

*Attorney for Plaintiff*

GEORGE A. WAGNER

/s/ Gary E. Schnitzer, Esq.

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Las Vegas, NV 89123

*Attorney for Defendant*

FORD MOTOR CREDIT COMPANY LLC

**IT IS ORDERED.**

DATED this 20th day of March, 2018.

  
United States Magistrate Judge